



Wireless
Infrastructure
Association

August 7, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation, Review of the Commission's Rules Governing the 896-901/935-940 MHz Band, WT Docket No. 17-200; Improving Competitive Broadband Access to Multiple Tenant Environments, GN Docket No. 17-142; Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 17-79; Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84.

Dear Ms. Dortch:

The Wireless Infrastructure Association (WIA),¹ pursuant to Section 1.1206 of the Federal Communications Commission's rules,² hereby provides notice that on August 5, 2019 the undersigned and Justin McCuen, Government Affairs Legal Intern for WIA, met with William Davenport, Chief of Staff & Senior Legal Advisor for Commissioner Starks. During the meeting, WIA discussed several issues that are critical to the wireless infrastructure industry. In particular, WIA discussed its workforce development efforts, including the Telecommunications Industry Registered Apprenticeship Program

¹ The Wireless Infrastructure Association (WIA) is the principal organization representing companies that build, design, own, and manage telecommunications facilities throughout the world. WIA's members include infrastructure providers, carriers, and professional services firms.

² 47 C.F.R. § 1.1206.

(TIRAP)³ and Telecommunications Education Center (TEC)⁴ initiatives. WIA noted its efforts to assist in the re-training of the American workforce to prepare for the jobs that will be created as new technology is introduced and utilized more widely. Additionally, WIA highlighted its efforts to connect employers with students and graduates of academic institutions, like historically black colleges and universities (HBCUs). Indeed, TIRAP focuses on the development of technical skills required for field installation work, but there is a much bigger opportunity to facilitate new jobs in areas such as RF engineering, site acquisition, construction management, project management, commercial drone operators, and finance/accounting.

WIA discussed its support for identifying and repurposing underutilized spectrum bands that can support more advanced technologies and enable new uses for existing frequencies. WIA detailed its support for the proposed realignment of the 900 MHz band.⁵ The parties discussed the heightened needs of these use cases and how this low-band spectrum would support a new broadband option that could provide necessary consistency and reliability. WIA urges swift action on the adoption of rules authorizing a 900 MHz broadband service because of the benefits it would provide to utilities, critical infrastructure, and business enterprise users.

The recent Multi-Tenant Environment (MTE) *Notice of Proposed Rulemaking* is also of interest to the wireless infrastructure industry. WIA emphasized its and its member companies' commitment to facilitating broadband deployment to MTEs so that tenants have access to greater opportunities and businesses can be more productive and competitive. WIA emphasized the many benefits, including the promotion of effective and efficient broadband adoption, that can come from distributed antenna systems (DAS) deployments in MTEs. For example, DAS systems and other innovations from the

³ See TELECOMMUNICATIONS INDUSTRY REGISTERED APPRENTICESHIP PROGRAM, <https://www.tirap.org/> (last visited Aug. 7, 2019) (explaining how TIRAP is a joint venture of telecommunications companies, industry associations, and the U.S. Department of Labor, and graduates of the program receive a national, industry-recognized credential that certifies occupational proficiency and provides opportunities for career advancement).

⁴ TELECOMMUNICATIONS EDUCATION CENTER, <https://tec-online.org/> (last visited Aug. 7, 2019) (explaining how the TEC program is designed to equip the wireless workforce to meet the demands of 5G build-out and deployment through technical skills training developed by WIA with significant contributions from its members, partners, subject matter experts, and academia).

⁵ Review of the Commission's Rules Governing the 896-901/935-940 MHz Band, WT Docket No. 17-200, *Notice of Proposed Rulemaking (NPRM)*, (Mar. 14, 2019); see Notice of *Ex Parte* Communication from John A. Howes, Jr., WIA, WT Docket No. 17-200 (filed July 3, 2019) ("As the record reflects, realignment of the 900 MHz band will facilitate the intersection of wireless broadband and the utility and critical infrastructure sector.").

wireless infrastructure industry can help address complex issues for propagating signals inside large MTEs. In addition, neutral host DAS providers help facilitate competition and connectivity. WIA appreciates the Commission's efforts to promote connectivity in MTEs and looks forward to responding to the *NPRM* with Comments.

Further, consistent with arguments presented in previous filings,⁶ WIA discussed its support for clarifying terms in Section 6409(a) of the Spectrum Act⁷ and the implementing regulations. For example, compound expansions, specifically excavation within thirty feet of a tower site and that do not otherwise constitute substantial changes, should qualify for relief under Section 6409(a) and the implementing rules. These clarifications would greatly aid in expediting and reducing the costs of the rollout of 5G as compound expansions are needed for data centers at the edge.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS. Please do not hesitate to contact the undersigned with any questions.

July 7, 2019

Respectfully submitted,

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⁶ See generally Notice of *Ex Parte* Presentation from Matthew H. Mandel, WIA, WT Docket No. 17-79, WC Docket No. 17-84 (filed June 17, 2019); Notice of *Ex Parte* Communication from Matthew H. Mandel, WIA, WT Docket No. 17-79, WC Docket No. 17-84 (filed May 20, 2019); Notice of *Ex Parte* Communication from Sade Dada, WIA, WT Docket No. 17-79, WC Docket No. 17-84 (filed Sept. 10, 2018); Notice of *Ex Parte* Communication from Sade Dada, WIA, WT Docket No. 17-79, WC Docket No. 17-84 (filed Aug. 30, 2018).

⁷ Middle Class Tax Relief and Job Creation Act of 2012 ("Spectrum Act"), Pub. L. No. 112-96, 126 Stat. 156, 232-33 § 6409(a) (2012) (codified at 47 U.S.C. § 1455(a)).